

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-30422
	)	(Chapter 11)
JAMIESON CAPEX FUNDS, LLC.	)	
	)	
Debtor.	)	
_____	)	

**NOTICE OF MOTION TO APPROVE COMPROMISE WITH  
TIMOTHY KARSKY, COMMISSIONER OF THE NORTH DAKOTA SECURITIES  
DEPARTMENT AND THE STATE OF NORTH DAKOTA**

NOTICE IS HEREBY GIVEN that the above-referenced debtor has filed a motion to approve a compromise with Timothy Karsky, Commissioner of the North Dakota Securities Department, and the State of North Dakota. Under the proposed compromise, a pending adversary proceeding with be settled in exchange for the State of North Dakota paying \$150,750.00 to the debtor's estate, to be disbursed in accord with a confirmed plan of reorganization. The debtor, in turn, is releasing claims against the state, though a related entity—the Secure Income Fund—is expressly *not* releasing claims against the state. The full terms of the settlement are set forth in the motion itself.

NOTICE IS FURTHER GIVEN that written objections to the motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court for the District of North Dakota, 655 1st Ave. N. Suite 210, Fargo, ND 58102-4932 within twenty-one (21) days from the date of the mailing of this notice. Any objections not filed and served may be deemed waived.

*[Signature Block and Certificate of Service on Following Page]*

Respectfully submitted,

Dated: June 30, 2025

By: /s/ Maurice B. VerStandig  
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*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1st day of July, 2025, a copy of the foregoing is being served via First Class Mail, postage prepaid, to all parties on the mailing matrix attached hereto as Exhibit B, *except* no copy will be mailed to (i) this Honorable Court; or (ii) attorneys employed by The Dakota Bankruptcy Firm.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig